Case 1:23-cr-00464-AS Document 29 Filed 05/20/24 Page 1 of 1

Federal Defenders OF NEW YORK, INC.

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Tamara Giwa
Executive Director

Jennifer L. Brown Attorney-in-Charge

BY ECF

Honorable Arun Subramanian United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007 May 20, 2024

Application GRANTED. The conference will now take place on July 30, 2024, at 4:00 PM.

SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: May 21 2024

Re: <u>United States v. Virginia Marisol Lemus Recinos</u>

23 Cr. 464 (AS)

Dear Judge Subramanian:

The parties write in response to the Court's May 17 order. After receiving additional mitigation records, the defense submitted a Deferred Prosecution request to AUSA Edward Robinson on May 19, 2024. The request will now undergo consideration by the Government. In light of this ongoing process, the parties ask for an adjournment of the May 22 status conference. Moreover, since undersigned counsel will begin parental leave in early June, I ask that the next conference date be set in mid-to-late July to allow time for the case to be transferred internally.

The defense consents to the exclusion of time under the Speedy Trial Act until the date of the next conference.

Respectfully submitted,

/s/

Zawadi Baharanyi Assistant Federal Defender (212) 417-8735

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CC: AUSA Edward Robinson